

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Scaer, <i>et al.</i> ,)	
)	
<i>Plaintiffs</i> ,)	
)	
v.)	Case No. 1:24-cv-00277
)	
City of Nashua, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	

**JOINT MOTION TO EXTEND DEADLINES ESTABLISHED
IN THE COURT’S ORDER OF FEBRUARY 5, 2025**

NOW COME the Parties, by and through Counsel, and jointly move to extend the deadlines established in the Court’s Order of February 5, 2025. The basis for this joint motion is as follows:

The Motion for Preliminary Injunction remains pending and there is a strong likelihood of an appeal should the Court deny the Motion for Preliminary Injunction. The Parties agree that to avoid unnecessary legal expenses it makes sense to postpone discovery until after this Court issues its ruling on the Plaintiffs’ Motion for Preliminary Injunction because if the Defendants prevail, the Plaintiffs have indicated their intent to appeal, which likely would necessitate a further amendment to the schedule and could alter the relevant issues. If the Plaintiffs prevail, the schedule will proceed as articulated in the attached Civil Form 3. The parties were unable to find a trial date until June 2026 due to the commitments of Defense Counsel and thus propose a trial at that time.

WHEREFORE, for the reasons set forth above, the parties respectfully request that this Honorable Court grant this motion and approve the amended schedule set forth in Civil Form 3.

Respectfully submitted,

Counsel for Plaintiffs

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Dated: February 27, 2025

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Dated: February 27, 2025

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Dated: February 27, 2025

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Dated: February 27, 2025

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on all counsel of record through the Court's electronic filing system.

Dated: 2/27/25

/s/ Jonathan A. Barnes

Jonathan A. Barnes